

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

1. On or about April 6, 2022, Plaintiffs Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, Marcel Fontaine original petition in the State Court, thus initiating the “State Court Lawsuit.” The State Court Lawsuit names FSS as a defendant.

2. On July 29, 2022 (the “Petition Date”), FSS filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas, Houston Division, pending as Case No. 22–60043 (the “Bankruptcy Case”).

3. FSS timely files this Notice of Removal within 90 days of the Petition Date pursuant to Federal Rule of Bankruptcy Procedure 9027(a)(2).

4. The United States District Court for the Western District of Texas has original jurisdiction over this action pursuant to 28 U.S.C. §1334(b) as the State Court Lawsuit is “related to” the Bankruptcy Case. Additionally, there the diversity jurisdiction under 28 U.S. Code § 1332.

5. Removal to this Bankruptcy Court is proper pursuant to 28 U.S.C. § 1452, Federal Rule of Bankruptcy Procedure 9027, and the Order of Reference of Bankruptcy Cases and Proceedings of the U.S. District Court for the Western District of Texas (the “Order of Reference”). The State Court Lawsuit was filed in Travis County, Texas. The U.S. District Court for the Western District of Texas, Austin Division, is the United States district and division embracing that county. The Order of Reference provides that “[a]ll bankruptcy cases and proceedings filed under Title 11 of the United States Code or arising from or related to any case or proceeding filed under Title 11, shall be automatically referred to the bankruptcy judges of this district” subject to exceptions that do not apply here.

6. FSS consents to entry of final orders or judgment by the bankruptcy court.

Respectfully submitted October 27, 2022.

**FREE SPEECH SYSTEMS, LLC**

/s/ Ray Battaglia

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served by U.S.P.S. first class mail on all parties indicated in the attached service list within 24 hours of the filing, and (c) the following parties by email on the date of filing:

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